

SH2\_Answer\_to\_All\_Cross-Claims.doc

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		
EASYTEX CORPORATION LIMITED,	:	ECF CASE
	:	
	:	07 CV 3907 (BSJ)
Plaintiff,	:	
-against-	:	ANSWER BY AMERICAN
	:	INTERNATIONAL LINE, INC.
PETER & FRANK OF NY, CORP., et al.,	:	<u>TO ALL CROSS-CLAIMS</u>
	:	
Defendants.	:	(Jury Demand)
	:	
-----X		

Carl E. Person, appearing on behalf of the Defendant, **American International Line, Inc.**, also, sued herein under its trade name "**Mercury**" (hereinafter, "American"), respectfully **DENIES** the allegations in each of the cross claims asserted against American (by Stop & Stor, Hicksville Project, LLC s/h/a Westy Storage Centers, Korea Express USA, Inc., Top Ten Trans, Inc., GFA, Inc. and all future cross claims, if any, to be asserted by Defendants Nexxon Trading, Inc., Solution USA, Inc., Gavin Fashion, Inc., JKM USA, Corp. and any all additional co-defendants to be added from time to time by the Plaintiff. The purpose of this combined and continuous pleading is to simplify the docket sheet and record, avoid mistakes, and to make sure that American has denied and continues to deny, as a continuing pleading, any and all allegations that it is liable to any co-defendant as to any cross claims, made in any initial or amended pleadings (past or future) by any co-defendant.

**WHEREFORE**, American respectfully requests that all cross-claims against American be dismissed in their entirety, with costs and attorneys' fees.

**Jury Demand**

American hereby demands a trial by jury of all issues properly triable to a jury pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

**Dated: New York, New York  
August 16, 2008**



---

**Carl E. Person (CP 7637)  
Attorney for Defendant, American  
International Line, Inc.  
325 W. 45th Street - Suite 201  
New York, New York 10036-3803  
(212) 307-4444**

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing Answer by American International Lines, Inc. to All Cross-Claims was served on the respective attorneys for the Plaintiff and Co-Defendants by causing the same to be delivered by first class mail, postage pre-paid to:

Chull S. Park, Esq. [Pltf]  
Hyun Suk Choi, Esq.  
The Park Law Group, LLC  
23 S. Warren Street - 2nd Floor  
Trenton NJ 08608

Jeffrey S. Stephens, Esq. [Westy]  
Jeffrey S. Stephens, P.C.  
14 Duncan Drive  
Greenwich CT 06831

Hendrick Vandamme, Esq. [Stop&Stor]  
Patrick Joseph Maloney, Esq.  
Law Offices of Harvey & Vandamme  
90 Broad Street – Suite 2202  
New York NY 10004

John Cooper Lane, Esq. [Korea]  
Law Offices of John C. Lane  
191 Godwin Avenue  
Wyckoff NJ 07481

David Yita Loh, Esq. [Hong, incl Hong's CrossCl]  
Cozen O'Connor  
45 Broadway Atrium – Suite 1600  
New York NY 10006

Peter Caccamo-Bobchin, Esq. [Westy]  
Law Offices of John C. Lane  
140 Broadway – 46<sup>th</sup> Fl. PMB46103  
New York NY 10005

Henry P. Gonzalez, Esq. [GFA]  
Rodriguez O'Donnell Gonzalez & Williams, P.C.  
1211 Connecticut Avenue, N.W. – Suite 800  
Washington DC 20036

**Dated: August 16, 2008**



---

**Carl E. Person (CP 7637)**